

Neel Chatterjee (SBN 173985)
nchatterjee@goodwinlaw.com

James Lin (SBN 310440)
jlin@goodwinlaw.com

GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, California 94025
Tel.: +1 650 752 3100
Fax.: +1 650 853 1038

Brett Schuman (SBN 189247)
bschuman@goodwinlaw.com

Shane Brun (SBN 179079)
sbrun@goodwinlaw.com

GOODWIN PROCTER LLP
Three Embarcadero Center
San Francisco, California 94111
Tel.: +1 415 733 6000
Fax.: +1 415 677 9041

Hong-An Vu (SBN 266268)
hvu@goodwinlaw.com

Todd A Boock (SBN 181933)
tboock@goodwinlaw.com

GOODWIN PROCTER LLP
601 S. Figueroa Street, 41st Floor
Los Angeles, California 90017
Tel.: +1 213 426 2500
Fax.: +1 213 623 1673

Attorneys for Defendant: Otto Trucking LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**[PROPOSED] ORDER GRANTING
DEFENDANT OTTO TRUCKING'S
MOTION FOR RELIEF FROM NON-
DISPOSITIVE PRETRIAL ORDERS
(DOCKET NO. 1391)**

Courtroom: 8, 19th Floor
Judge: Honorable William Alsup
Trial Date: October 10, 2017

Filed/Lodged Concurrently with:
1. Declaration of Todd A. Boock
2. [Proposed] Order

Defendant Otto Trucking LLC (“Otto Trucking”) filed a Motion for Relief from Judge Corley’s August 28, 2017 oral Minute Order re: Plaintiff Waymo LLC’s (“Waymo”) and non-party Keker, Van Nest & Peters LLP’s (“KVN”) Motions to Quash Subpoena and KVN’s Motion for Protective Order; and Order re Scope of Waymo’s Privilege Waiver (Docket (“Dkt.”) 1391).

FOR GOOD CAUSE SHOWN, the Court orders as follows:

1. Magistrate Judge Corley’s August 28, 2017 Order as to Waymo’s and non-party KVN’s Motions to Quash Subpoena and KVN’s Motion for Protective Order (Dkt. 1391) is vacated as to the documents sought by the subpoena, and is without prejudice to Otto Trucking seeking further relief as to the deposition of KVN;
2. KVN is ordered to produce all responsive documents forthwith, but no later than _____.
3. The scope of the privilege waiver referenced by the August 18, 2017 Order (Dkt. 1272) includes Waymo’s entire 2016-17 investigation into the individuals contemplated by the KVN memo identified at WAYMO-UBER-00086812 to -00086814.

IT IS SO ORDERED.

Dated: _____, 2017

HON. WILLIAM H. ALSUP
UNITED STATES DISTRICT JUDGE